

BEFORE THE
POSTAL RATE COMMISSION

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 1997

DOCKET NO. R97-1

TENTH SET OF INTERROGATORIES FROM UNITED PARCEL SERVICE
TO UNITED STATES POSTAL SERVICE WITNESS MAYES
(UPS/USPS-T37-52 through 56)

(August 27, 1997)

Pursuant to the Commission's Rules of Practice, United Parcel Service hereby serves the following interrogatories and requests for production of documents directed to United States Postal Service witness Mayes (UPS/USPS-T37-52 through 56).

Respectfully submitted,



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Of Counsel.

**UNITED PARCEL SERVICE NINTH SET OF INTERROGATORIES
TO UNITED STATES POSTAL SERVICE WITNESS MAYES**

UPS/USPS-T37-52. Please explain how offering the packaging service leads to a net loss in Parcel Post volume due to a shift towards Priority Mail.

UPS/USPS-T37-53. Referring to WP I.A., page 23, and WP I.F., please confirm that you assume that no additional volume will be DDU entered as a result of the proposed DDU discount. Please explain your answer in detail.

UPS/USPS-T37-54. Referring to WP II.C., page 1, lines 13 - 23:

- (a) Please confirm that these numbers are changes in revenues, not actual revenues.
- (b) Please provide the TYAR revenues, as well as the TYBR and TYAR rates volumes for these categories.

UPS/USPS-T37-55. Referring to WP II.C., page 3, lines 2 - 10, please confirm that these numbers are changes in cost, not actual cost.

UPS/USPS-T37-56. Refer to your response to UPS/USPS-T37-3.

- (a) Confirm that you have no survey data with respect to the amount of current volume entered as DDU or new volume that would be entered as DDU if a discount were implemented. If not confirmed, please explain.
- (b) Confirm that you assumed that there would be no new volume attracted by the implementation of DDU program in and of itself (i.e., other than the growth applicable to parcel post as a whole from the base year to the test year). If not confirmed, please explain.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document in accordance with section 12 of the Commission's Rules of Practice.



Albert P. Parker, II

Dated: August 27, 1997
Philadelphia, PA